

# Exhibit 4



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**RE: Wilkins - this week's depositions**

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**From** Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>

**Date** Mon 11/3/2025 5:21 PM

**To** Alexandra Block <[ABlock@aclk-il.org](mailto:ABlock@aclk-il.org)>; Ahn, Joan E. <[JAhn@taftlaw.com](mailto:JAhn@taftlaw.com)>; O'Brien, Barton <[bobrien@taftlaw.com](mailto:bobrien@taftlaw.com)>; Schroeder, Sara <[SSchroeder@taftlaw.com](mailto:SSchroeder@taftlaw.com)>; Winkowski, Elizabeth <[EWinkowski@taftlaw.com](mailto:EWinkowski@taftlaw.com)>

**Cc** xACLUCPD <[xaclucpd@arnoldporter.com](mailto:xaclucpd@arnoldporter.com)>; Joe DiCola <[JDICola@aclk-il.org](mailto:JDICola@aclk-il.org)>; Hirsh Joshi <[HJoshi@aclk-il.org](mailto:HJoshi@aclk-il.org)>; Sheldon Solow <[shel.solow@gmail.com](mailto:shel.solow@gmail.com)>

Alexandra,

We are working to schedule dates with the deponents and will be providing them over the course of the next couple weeks. We will proceed in good faith but not in response to arbitrary and extraordinarily tight timelines set by you and not the Court.

We appeared on October 22 before the Court. On that date, the close of discovery schedule was set for March 13. We will set mutually convenient dates within that deadline. We see no basis for court intervention in this scheduling process.

Mike

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**From:** Alexandra Block <[ABlock@aclk-il.org](mailto:ABlock@aclk-il.org)>

**Sent:** Sunday, November 2, 2025 4:52 PM

**To:** Ahn, Joan E. <[JAhn@taftlaw.com](mailto:JAhn@taftlaw.com)>; Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>; O'Brien, Barton <[bobrien@taftlaw.com](mailto:bobrien@taftlaw.com)>; Schroeder, Sara <[SSchroeder@taftlaw.com](mailto:SSchroeder@taftlaw.com)>; Winkowski, Elizabeth <[EWinkowski@taftlaw.com](mailto:EWinkowski@taftlaw.com)>

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**Subject:** RE: Wilkins - this week's depositions

Joan,

We are available on January 14. However, we asked the City for available deposition dates for all seventeen unscheduled witnesses, and we only received one date.

We have been working to schedule these depositions since we noticed them on July 3. That was four months ago. The delay in providing basic scheduling information is unacceptable.

Please provide available dates for all of the witnesses by tomorrow (Monday) or we will be compelled to seek a court order setting a prompt deadline for the City to provide available deposition dates for each witness.

Thank you,  
Alexandra

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**From:** Ahn, Joan E. <[JAhn@taftlaw.com](mailto:JAhn@taftlaw.com)>

**Sent:** Wednesday, October 29, 2025 9:07 AM

**To:** Alexandra Block <[ABlock@aclk-il.org](mailto:ABlock@aclk-il.org)>; Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>; O'Brien, Barton

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Sheldon Solow <[shel.solow@gmail.com](mailto:shel.solow@gmail.com)>

**Subject:** RE: Wilkins - this week's depositions

Counsel:

Barbara West is available for her deposition on Wednesday, January 14, 2026. Please confirm if that date works for you.

Thank you,  
Joan

 **Joan E. Ahn**

Staff Attorney

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**From:** Alexandra Block <[ABlock@aclu-il.org](mailto:ABlock@aclu-il.org)>

**Sent:** Tuesday, October 28, 2025 12:20 PM

**To:** Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>; O'Brien, Barton <[bobrien@taftlaw.com](mailto:bobrien@taftlaw.com)>; Schroeder, Sara

<[SSchroeder@taftlaw.com](mailto:SSchroeder@taftlaw.com)>; Winkowski, Elizabeth <[EWinkowski@taftlaw.com](mailto:EWinkowski@taftlaw.com)>; Ahn, Joan E. <[JAhn@taftlaw.com](mailto:JAhn@taftlaw.com)>

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Sheldon Solow <[shel.solow@gmail.com](mailto:shel.solow@gmail.com)>

**Subject:** RE: Wilkins - this week's depositions

Mike,

We confirm Mr. Beasley's deposition will begin at 9:30 on Thursday. As I mentioned, I will be attending with Mr. Beasley.

We request that the City provide by Friday, October 31, available deposition dates for the following unconfirmed deponents.

- a. John Hein, CPD
- b. Michael Donnelly, CPD
- c. Stephen Chung, CPD
- d. Steven Caluris, former CPD
- e. Barbara West, retired CPD
- f. John Escalante, retired CPD
- g. Kevin Navarro, retired CPD

- h. Eddie Johnson, former CPD
- i. Charlie Beck, former CPD
- j. Fred Melean, retired CPD
- k. David Brown, former CPD

Additionally, please provide by Friday, October 31, the City's proposed language for a stipulation in lieu of a deposition for the following current/former Mayors and Deputy Mayors. If the City does not provide proposed stipulations, we expect that the City will provide available deposition dates for these individuals by the end of the week.

- a. Rahm Emanuel
- b. Lori Lightfoot
- c. Janey Rountree
- d. Walter Katz
- e. Susan Lee
- f. Garien Gatewood

Thank you,  
Alexandra

Alexandra K. Block  
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**From:** Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>

**Sent:** Tuesday, October 28, 2025 10:20 AM

**To:** Alexandra Block <[ABlock@aclu-il.org](mailto:ABlock@aclu-il.org)>; O'Brien, Barton <[bobrien@taftlaw.com](mailto:bobrien@taftlaw.com)>; Schroeder, Sara <[SSchroeder@taftlaw.com](mailto:SSchroeder@taftlaw.com)>; Winkowski, Elizabeth <[EWinkowski@taftlaw.com](mailto:EWinkowski@taftlaw.com)>; Ahn, Joan E. <[JAhn@taftlaw.com](mailto:JAhn@taftlaw.com)>  
**Cc:** xACLUCPD <[xaclucpd@arnoldporter.com](mailto:xaclucpd@arnoldporter.com)>; Joe DiCola <[JDICOLA@aclu-il.org](mailto:JDICOLA@aclu-il.org)>; Hirsh Joshi <[HJoshi@aclu-il.org](mailto:HJoshi@aclu-il.org)>; Sheldon Solow <[shel.solow@gmail.com](mailto:shel.solow@gmail.com)>

**Subject:** RE: Wilkins - this week's depositions

Alexandra,

For Kevin Ryan's deposition, Nicole Mattingly and myself will be attending. We would also like to receive a Zoom link for the deposition as an attorney will be attending remotely for a portion of the deposition.

I spoke with Bart O'Brien who is handling Mr. Beasley's deposition. He would like to start the deposition at 9:30 am to ensure we complete the deposition before your hard stop time. Also, could you please let us know who will be in attendance for Mr. Beasley's deposition.

Finally, Steve Caluris contacted our firm. We will be representing him. He has a conflict with the subpoena date and we will propose some new dates for his deposition.

Thank you,  
Mike

**Michael P. Sheehan**

Partner

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**From:** Alexandra Block <[ABlock@aclu-il.org](mailto:ABlock@aclu-il.org)>

**Sent:** Monday, October 27, 2025 11:02 AM

**To:** Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>; O'Brien, Barton <[bobrien@taftlaw.com](mailto:bobrien@taftlaw.com)>; Schroeder, Sara <[sschroeder@taftlaw.com](mailto:sschroeder@taftlaw.com)>; Winkowski, Elizabeth <[ewinkowski@taftlaw.com](mailto:ewinkowski@taftlaw.com)>; Ahn, Joan E. <[jahn@taftlaw.com](mailto:jahn@taftlaw.com)>

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**Subject:** Wilkins - this week's depositions

Counsel,

Can you please provide the name(s) of the individuals attending Kevin Ryan's deposition on Wednesday for the building security list?

As I mentioned to Mike, I have a hard stop for Jacquez Beasley's deposition at 5:50pm on Thursday. The attendees for that deposition will be Mr. Beasley and myself.

Alexandra

Alexandra K. Block

Director, Criminal Legal System and Policing Project

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